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6 Attorneys for KAREN GOWINS and Many Wildfire Victim Creditors

7
8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
11

12 *In re:*

13 PG&E CORPORATION

14 -and-

15 PACIFIC GAS AND ELECTRIC
COMPANY

16 Debtors.

17 ☐ Affects PG&E Corporation

18 ☐ Affects Pacific Gas & Electric

19 ☒ Affects Both Debtors

20 *All papers shall be filed in the Lead Case,*
21 *No. 19-30088 (DM)*

) **Case No. 19-30088 (DM)**

) Chapter 11

) (Lead Case)

) (Jointly Administered)

) **DECLARATION OF BONNIE E. KANE**
) **IN SUPPORT OF EX PARTE**
) **APPLICATION FOR AN ORDER**
) **SHORTENING TIME TO HEAR A**
) **MOTION FOR APPOINTMENT OF AN**
) **EXAMINER OF VOTING**
) **PROCEDURAL IRREGULARITIES**
) **PURSUANT TO SECTION 1104 (c) OF**
) **THE BANKRUPTCY CODE AND**
) **BANKRUPTCY RULE 2007.1**

) Date: TBD

) Time: TBD

) Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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24 I, Bonnie E. Kane, hereby declare under penalty of perjury that the following is true and
25 correct to the best of my knowledge, information and belief.

26 1. I am a partner in the Kane Law Firm, counsel to Creditor Karen Gowins and Many
27

28 **DECLARATION OF BONNIE E. KANE IN SUPPORT OF EX PARTE APPLICATION FOR AN ORDER**
SHORTENING TIME TO HEAR A MOTION FOR APPOINTMENT OF AN EXAMINER OF VOTING
PROCEDURAL IRREGULARITIES PURSUANT TO SECTION 1104 (c) OF THE BANKRUPTCY CODE AND
BANKRUPTCY RULE 2007.1

1 Fire Victim Creditors in the above referenced matter.

2 2. I emailed Mr. Karotkin this afternoon and also spoke with him on the telephone. He
3 stated he would not agree to an order shortening time and confirmed that in an email.

4 3. I emailed Ms. Erin Dexler at Millbank and I also left a voice mail for Mr. William Bice,
5 also of Milbank. Ms. Dexler emailed back stating the Unsecured Creditors Committee "will take
6 no position on the motion to shorten time or the motion for appointment of an examiner."

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8 4. I emailed Mr. Robert Julian with the Official Committee of Tort Claimants, and I
9 telephoned him as well. He did not answer and I left a detailed message. I have not had a
10 response from Mr. Julian.

11 5. I emailed Mr. Timothy Laffredi, Assistant U.S. Trustee. I also telephoned Mr. Laffredi
12 and left a detailed message. I have not had a response from Mr. Laffredi.

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14 6. My emails contained the Ex Parte Application and the Motion for Appointment of An
15 Examiner, as well as my Declaration supporting that motion without exhibits.

16 I declare under penalty of perjury under the laws of the State of California and the United
17 States that the foregoing is true and correct. Executed on May 19, 2020.

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19 _____
20 /s/ Bonnie E. Kane

21 BONNIE E. KANE
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